

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§
v. § Criminal No. 4:25-cr-0030-S1
§
GIOVANNI VICENTE MOSQUERA SERRANO §
aka Jhovanni San Vicente §
aka El Viejo §

**UNITED STATES OF AMERICA
MOTION TO UNSEAL SUPERSEDING INDICTMENT
AS TO GIOVANNI MOSQUERA SERRANO**

The United States of America (“Government”) by and through United States Attorney Nicholas J. Ganjei and Assistant United States Attorneys Anibal J. Alaniz and Casey N. MacDonald files this motion to unseal the superseding indictment as to Giovanni Vicente MOSQUERA SERRANO (“MOSQUERA SERRANO”).

As alleged, MOSQUERA SERRANO is a senior leader of Tren de Aragua (“TdA”) a transnational gang and designated Foreign Terrorist Organization. He oversees TdA criminal operations across Colombia, Central America and the United States. MOSQUERA SERRANO is the highest ranking TdA member to be formerly charged in the United States.

Although MOSQUERA SERRANO is still a fugitive, the Government intends to issue a reward for information that leads to his arrest. Therefore, there is no reason for this case to remain under seal.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

s/ *Anibal J. Alaniz*

Anibal J. Alaniz
Assistant United States Attorney
Texas Bar No. 00966600
Federal I.D. No. 12590
1000 Louisiana
Suite 2300
Houston, Texas 77002
713-567-9000 (office)
713-567-9487 (direct)

s/ *Casey N. MacDonald*

Casey N. MacDonald
Assistant United States Attorney
New Jersey State Bar No. 043362000
Federal Bar No. 915752
1000 Louisiana
Suite 2300
Houston, Texas 77002
713-567-9000 (office)
713-567-9798 (direct)